

EXHIBIT 213

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
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6 IN RE: JUUL LABS, INC., MARKETING,
7 SALES PRACTICES, AND PRODUCTS Case No.
LIABILITY LITIGATION 19-MD-02913-WHO

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12 VIDEO-RECORDED 30(B)(6) DEPOSITION OF
13 SAN FRANCISCO UNIFIED SCHOOL DISTRICT
14 REGARDING COMMUNICATION AND AWARENESS
15 THROUGH ITS DESIGNEE QUARRY PAK

16 (Via videoconference)

17 Thursday, May 27, 2021
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24 REPORTED BY:
25 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR
JOB NO. 192989

1 product is?

2 A. Yes.

3 Q. When did you first become aware of ENDS
4 products?

5 A. We became aware of ENDS products around
6 2015. 2014 is when we first became aware from
7 the State Department of Education, 2014-15
8 school year.

9 Q. Do you remember the first time that you
10 became aware that a student was using an ENDS
11 product while on campus?

12 A. I don't recall. That would be later in
13 that time period, like two or three years later.

14 Q. Did there ever come a time when there
15 was discussions from teachers or school nurses
16 or any other school personnel about students
17 using ENDS products?

18 A. Yes, that would be 2017-18. That was
19 when the requests were coming more to us.

20 Q. Can you describe that for me, when you
21 first started getting those requests?

22 A. It was a request from principals,
23 nurses, social workers.

24 Q. And what were they requesting?

25 A. Information about training, education,

1 policies, what they should do with the products,
2 because they didn't know what to do with it.

3 Q. And did that lead to school board
4 policies in response to ENDS use?

5 A. We have a tobacco grant, and so we
6 changed the school board policy in 2014 when we
7 first learned of the ENDS products.

8 Q. I believe we talked about this during
9 the first deposition.

10 When you say that they changed the
11 policy, is that when ENDS products were included
12 as a tobacco product in the school board policy?

13 A. Correct.

14 Q. And at that point ENDS products were
15 not allowed on campuses?

16 A. Correct. We are a tobacco-free campus,
17 city and county, for schools.

18 Q. And as we discussed last time, that
19 also included nicotine products; correct?

20 A. Yes.

21 Q. With the exception of nicotine products
22 that were prescribed by a doctor or were being
23 used for cessation, like nicotine gum?

24 A. No. It's only prescribed by doctors
25 and medical orders, in my understanding, in my

1 Q. So do you put all of them in one
2 category or do you think about JUUL separately
3 from the rest?

4 A. I think both. I think it's like
5 Kleenex or Band-Aids. You know, it's become
6 the -- or it was or is the predominantly known
7 product and most widely used.

8 So I think our -- when our questions
9 came and the media requests came, they
10 specifically asked about JUULs. There was
11 several generations of ENDS products and JUUL
12 was like the third wave or something like that.

13 Q. Do you understand JUUL to function
14 differently than the other products?

15 A. In what way?

16 Q. In any way.

17 A. All the products function differently.
18 So they --

19 Q. Do you --

20 A. But it's the same -- they are all ENDS,
21 nicotine delivery systems.

22 Q. They're all ENDS. Okay.

23 And do you understand JUUL to be better
24 or worse from a health perspective for the user
25 than other ENDS products?

1 A. They could be. It depends on which --
2 what things you're comparing. So that's a very
3 general question.

4 Q. Okay. Let me try to be more specific.

5 Is there any particular ENDS product
6 that you think is less damaging to health than a
7 JUUL product?

8 A. I can't really think of anything, no.

9 Q. Do you think that there is any ENDS
10 product that's more damaging to health than a
11 JUUL product?

12 A. I can't really think of anything, no.

13 Q. Is it fair to say you kind of lumped
14 them all together in terms of being ENDS
15 products?

16 MR. CUTLER: Objection; asked and
17 answered.

18 BY MR. LEMIEUX:

19 Q. You can answer.

20 A. I don't think I lumped them all
21 together. I think that we recognize that JUULs
22 have a lot of nicotine in them and they are
23 attractive to use. They are marketed as the
24 iPhone of vapes or e-cigs. So they are very
25 distinct. And the ads were predominantly in our

1 city. I don't recall any other kind of ads on
2 corner stores or gas stations, things like that.

3 Definitely when the staff came to us,
4 they had different kinds of ENDS products, but
5 they did have a lot of JUUL products because
6 they were so small.

7 Q. I want to ask you specifically about a
8 statement you made about nicotine.

9 What is your understanding of how much
10 nicotine a JUUL product contains versus other
11 ENDS products?

12 A. Well, we draw from the Stanford Tobacco
13 Toolkit, and each JUULpod has at least one pack
14 of cigarettes, if not more, equivalent of
15 nicotine. So I think we had to update that when
16 we found out new information.

17 Q. Are you aware that other ENDS products
18 contain more nicotine than JUUL?

19 A. I suppose that was a similar -- it's
20 very similar. Some contain less, some contain
21 more. I don't know exact details of each
22 product.

23 Q. Okay. You mentioned advertisements.
24 When's the first time that you recall you saw a
25 JUUL advertisement?